

DECISION MEMORANDUM

TO: COMMISSIONER REDFORD
COMMISSIONER SMITH
COMMISSIONER KEMPTON
COMMISSION SECRETARY
COMMISSION STAFF

FROM: DON HOWELL
DEPUTY ATTORNEY GENERAL

DATE: APRIL 3, 2009

SUBJECT: ROCKY MOUNTAIN POWER'S REQUEST TO POSTPONE THE
FILING OF ITS INTEGRATED RESOURCE PLAN, CASE NO. PAC-E-
09-02

On March 27, 2009, Rocky Mountain Power filed a "Motion" to postpone the filing of its 2009 Integrated Resource Plan (IRP). Rocky Mountain's IRP was scheduled to be filed on the last business day of March 2009 but the Company now requests permission to file its 2009 IRP no later than May 29, 2009. Future IRPs will be filed on the last business day of March in odd number years.

BACKGROUND

The biennial IRP is a planning document that generally sets forth how electric and gas utilities intend to meet the energy requirements of their customers over the next 10 years. In Order No. 22299 the Commission directed each electric utility to file a biennial IRP that analyzes its customer base, load growth, supply-side resources, and demand-side management (DSM) resources. Order No. 27835 directed Rocky Mountain to file its IRP in December 2000 and every two years thereafter.

In February 2007, Rocky Mountain asked permission to file its December 2006 IRP no later than May 30, 2007. The Company also requested that the subsequent IRP be allowed to be filed no later than the last business day of March 2009. The Commission issued Order No. 30262 allowing the late filing and setting the new IRP filing date in March 2009, and every two years thereafter.

THE MOTION

In its Motion for Extension, Rocky Mountain states that the delay in completing and filing its 2009 IRP is attributable to three primary reasons. First and foremost, on February 11, 2009, the Company terminated its agreement to build the Lakeside 2 combined-cycle combustion turbine. Petition at 2. When the Company started planning its 2009 IRP, this plant was included in the resource stack with a planned in-service date of 2012. The Company indicated that it terminated the Lakeside 2 project so that it could “seek more cost-effective resource alternatives [given] the recessionary environment, continued declines in forward electricity and gas prices, the favorable outlook for future plant construction costs, and additional transmission import capability into Utah. . . .” *Id.* Given the termination of the Lakeside 2 project, the Company needs additional time to conduct further analysis and recreate its “preferred portfolio” for the 2009 IRP.

Second, in February 2009 Rocky Mountain developed a revised load forecast that reflects the impact from the economic recession on the Company’s projected load growth. The Company needs additional time to perform its analysis of the changes in its resources and load growth forecast in the 2009 IRP. Third, the Company is also conducting additional “resource acquisition risk analysis and wind integration cost analysis” that will not be completed by the existing filing deadline of March 31, 2009. *Id.* at 3. Allowing the Company to complete its analytical work given the basic changes to its resource and load growth assumptions is in the public interest. The Company asserts that future IRPs (e.g., the 2011 IRP) will be filed by the last business day of March in odd number years. *Id.* at 4.

Consequently, Rocky Mountain requests that the Commission approve an extension of time to file the 2009 IRP to no later than May 29, 2009. Rocky Mountain asserts that its future IRPs will be filed no later than the last business day of March.


STAFF RECOMMENDATION

Given the administrative nature of Rocky Mountain’s request, the Staff suggests that the Commission treat the Company’s “Motion” as a petition requesting modification of an existing Order. Rule 53, IDAPA 31.01.01.053. Rule 53 notes that pleadings that request a modification of an existing Order (i.e., Order No. 30262) are defined as “Petitions.” *Id.*

Staff recommends that the Commission grant Rocky Mountain an extension of its 2009 IRP filing date to May 29, 2009. Staff believes there is good cause to grant the requested relief without further notice or public comment.

COMMISSION DECISION

Does the Commission wish to grant Rocky Mountain's request to postpone the filing date of its 2009 IRP until no later than May 29, 2009? Does the Commission find that there is good cause to approve the request without further notice or public comment?



Don Howell
Deputy Attorney General

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